



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2405



Ref: 8HWM-FF

DEC 23 1991

Mr. Gary Baughman
Colorado Department of Health
4210 E. 11th Ave.
Denver, CO 80220

Re: OU 4 Final Workplan

Dear Mr. Baughman:

In general, this document has improved considerably over the draft version. Most of EPA's previous comments on the draft have been adequately addressed. However, there are still some problems and concerns with some of the proposed activities described in the Field Sampling Plan (FSP) and with the Baseline Risk Assessment (BRA) plan included in this document. In the interest of moving forward with the project, EPA recommends approval of the workplan assuming DOE makes the following changes and addresses the concerns outlined below:

1. A subset of surface soil sampling locations must be located on areas found to exhibit high counts levels during the radiological survey and a separate subset of locations to be randomly chosen.
2. The CDH method must be used for collection of surface soil samples to ensure comparability with data from other OUs.
3. Protocol for use of the Ludlum Model 12-1A alpha monitor for radiological survey must be consistent with SOP FO 1.16 or a justification for using a different protocol must be included in the workplan.
4. The workplan needs to explain how the risk assessment and environmental evaluations, and the phase I/phase II scheme set up in the IAG fit together.
5. The BRA portion of this document must include and discuss site-specific methods for dealing with site-specific conditions.

If DOE is unable to resolve the above concerns prior to the scheduled start of field activities (February 5, 1992), it is EPA's position that DOE can commence field activities which are not associated with the above concerns. However, since CDH is the lead agency for this OU, commencement of field activities shall be contingent upon CDH approval.

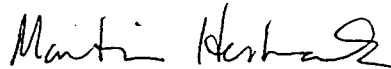
ADMIN RECORD

A-OU04-000108

Additional necessary efforts identified as work proceeds can be added to the program by amending the plan with technical memoranda. Enclosed, please find EPA's general and specific comments on the workplan which should be taken into consideration during execution of the field program.

Please do not hesitate to contact Arturo Duran of my staff at (303) 294-1080 with any question or comments you may have.

Sincerely,



Martin Hestmark, Manager
Rocky Flats Project

cc:

Frazer Lockhart, DOE
Harland Ainscough, CDH
Brent Lewis, DOE
Randy Ogg, EG&G
Bruce Peterman, EG&G
Arturo Duran, EPA